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Attorneys for Vizio, Inc.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SONY CORPORATION,

Plaintiff,

v.

VIZIO, INC.,

Defendant.

Case No. 08-01135 (RGK)(FMOx)

**DISCOVERY MATTER**

**DECLARATION OF STEVEN J.  
CORR IN SUPPORT OF THE JOINT  
STIPULATION REGARDING  
VIZIO, INC.'S MOTION TO  
COMPEL EXPERT REPORTS AND  
DEPOSITIONS, AND TO COMPEL  
DEPOSITIONS OF SONY  
WITNESSES IN THE UNITED  
STATES**

Date: September 2, 2009  
Time: 10:00 A.M.  
Judge: Hon. Fernando M. Olguin  
Courtroom: 9<sup>th</sup> Floor, Courtroom F

1 I, Steven J. Corr, declare as follows:

2 1. I am an associate with Jones Day, counsel of record for Defendant  
3 Vizio, Inc. (“Vizio”) in this action. I make this declaration in support of the Joint  
4 Stipulation Regarding Vizio, Inc.’s Motion to Compel Expert Reports and  
5 Depositions and Depositions of Sony Witnesses in the United States. The  
6 following is based on my personal knowledge and, if called as a witness, I could  
7 and would competently testify thereto.

8 2. Exhibit 1 is a true and correct copy of a letter from Ryan McCrum to  
9 Todd Kennedy sent on July 8, 2009.

10 3. Exhibit 2 is a true and correct copy of a letter from Todd Kennedy to  
11 Ryan McCrum sent on July 16, 2009.

12 4. Exhibit 3 is a true and correct copy of the July 17, 2009 Meet and  
13 Confer Transcript recording the meet and confer between counsel for Vizio and  
14 Sony Corporation (“Sony”) regarding Sony’s discovery responses.

15 5. Exhibit 4 is a true and correct copy of a letter from Ryan McCrum to  
16 Todd Kennedy sent on July 21, 2009.

17 6. Exhibit 5 is a true and correct copy of a letter from Todd Kennedy to  
18 Ryan McCrum sent on July 22, 2009.

19 7. Exhibit 6 is a true and correct copy of a letter from Steven Corr to Peter  
20 Klivans sent on June 9, 2009.

21 8. Exhibit 7 is a true and correct copy of a letter from Peter Klivans to  
22 Steven Corr sent on June 19, 2009.

23 9. Exhibit 8 is a true and correct copy of a letter from Joesph Milowic III  
24 to Steven Corr sent on July 24, 2009.

25 10. Exhibit 9 is a true and correct copy of Discovery Special Master’s  
26 Order No. 4: Joint Motion Re Expert Discovery from *In re: Katz Interactive Call*  
27 *Processing Litigation*, Case No. 07-ML-1816.

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1           11. Exhibit 10 is a true and correct copy of Defendants' Brief in Support of  
2 Their Motion to Transfer This Action to the Central District of California Pursuant  
3 to 28 U.S.C. § 1404(a) from *Vizio, Inc. v. Sony Corp. and Sony Corp. of America*,  
4 Case No. 08-5029.

5           12. Exhibit 11 is a true and correct copy of the Order for Jury Trial entered  
6 by the Court on April 6, 2009.

7           I declare under the penalty of perjury under the laws of the United States that  
8 the foregoing is true and correct.

9 Dated: August 12, 2009

JONES DAY

11 By: /s/ Steven J. Corr  
12 Steven J. Corr

13 Attorneys for Defendant Vizio, Inc.  
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